

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
)
 1. JOHN WILLIS)
 2. BRANT WELTY) CRIMINAL NO. 11-cr-10212-JLT
 8. MICHAEL SHAW)
 12. BRIDGET WELTY)
)
 Defendants.)

THIRD MOTION TO MODIFY FORFEITURE RESTRAINING ORDER
(Assets of Minimal or Negative Value)

The United States of America, by its undersigned counsel, hereby moves that this Court further modify the forfeiture restraining order entered in this case for the purpose of releasing from restraint the following three bank accounts (specified in paragraphs 2 e, f, and g of the restraining order) which, according to the financial institutions holding them, currently contain an amount too small to warrant forfeiture, show a negative value, and/or have been closed by the institution because of showing a negative value:

- e. Citibank, N.A., Bank Account No. 9118178007, in the name of 9Five4 Nightclub Group, Inc.;
- f. Bank of America, N.A., Account No. 009456972191, in the name of Brant Welty; and
- g. Bank of America, N.A., Account No. 229036933786, in the name of Mike's Boat & Jet Ski Rental.

WHEREFORE, the United States requests that this Court further modify the Restraining Order by entering a Third Order Modifying Forfeiture Restraining Order (Assets of Minimal or Negative Value) in the form submitted with this motion.

Respectfully submitted,
CARMEN M. ORTIZ
United States Attorney
By: /s/Richard L. Hoffman
Richard L. Hoffman
Timothy E. Moran
Assistant U.S. Attorneys
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3279

Dated: May 17, 2013

CERTIFICATE OF SERVICE

I hereby certify that I am filing the foregoing motion and the proposed order today via the ECF system, which will cause a copy to be served on all counsel of record by electronic mail.

/s/Richard L. Hoffman
Richard L. Hoffman
Assistant U.S. Attorney